

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

---

SMARTMATIC USA CORP., SMARTMATIC  
INTERNATIONAL HOLDING B.V. and SGO  
CORPORATION LIMITED,

Plaintiffs,

Case No. 22-cv-00098- JMB-JFD

v.

**ORDER FOR INSPECTION  
PROTOCOL**

MICHAEL J. LINDELL and MY PILLOW, INC.,

Defendants.

---

The Court enters the following protocol for inspection of documents responsive to Defendant My Pillow, Inc.’s (“MyPillow” and, together with Lindell and Smartmatic, the “Parties”) Request for Production No. 14 (the “Production”) pursuant to Plaintiffs’ Unopposed Inspection Protocol (Dkt. No. 268).

**PROTOCOL**

This protocol includes responsibilities that fall to Plaintiffs, Defendants, or a combination of the Parties. All below mentions of “Defendants” and “Plaintiffs” naturally include their agents, representatives, counsel, and/or experts unless otherwise specified. The parties shall cooperate in good faith and take all reasonable and necessary actions to satisfy the protocol.

- A. This protocol is intended to facilitate the review of documents responsive to MyPillow’s Request for Production (“RFP”) No. 14 pursuant to this Court’s April 15, 2024 Order (ECF No. 266).

B. The operative Protective Order Governing the Production and Exchange of Confidential Information (ECF No. 70) (“Protective Order”), and all provisions thereof, is hereby incorporated by reference to this Protocol.

C. For purposes of this Production only, Paragraph 8 of the Protective Order is amended as follows:

1. Paragraph 8(b) shall be amended to read, “Counsel for Parties in the Litigation, and the partners, associates, paralegals, secretaries, clerical, regular and temporary employees, and service vendors of such counsel (including outside copying and litigation support services) who are assisting with the Litigation[.]” For the avoidance of doubt, in-house counsel for Defendants are not permitted to review documents in this Production designated as “Attorney’s Eyes Only.”
2. Paragraph 8(c) shall be amended to read, “Experts, consultants, or independent litigation support services assisting counsel for the Parties that have been approved by Plaintiffs, and partners, associates, paralegals, secretaries, clerical, regular and temporary employees, and service vendors of such experts or consultants (including outside copying services and

outside support services) who are assisting with the Litigation[.] To the extent the Parties cannot reach an agreement as to which Experts, consultants, or independent litigation support services shall be approved, Plaintiffs may seek relief from the Court.”

D. Documents in the Production designated Attorneys’ Eyes Only will be labeled

“RFP 14 – Attorneys’ Eyes Only.”

**SO ORDERED.**

Dated: May 8, 2024

s/ John F. Docherty

JOHN F. DOCHERTY

United States Magistrate Judge